

EXHIBIT 71

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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MARK SOKOLOW, *et al.*,

Plaintiffs,

- against -

THE PALESTINE LIBERATION ORGANIZATION, *et al.*,

Defendants.

Docket No:
04-CV-397 (GBD) (RLE)

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DECLARATION OF AMBASSADOR MAEN AREIKAT

Pursuant to 28 U.S.C. § 1746, I, Maen Rashid Areikat, declare under penalty of perjury under the laws of the United States of America, as follows:

1. I currently reside, with my family, at 7814 Montvale Way, McLean, VA, 22102.
2. I am over eighteen years old, and I am competent to make this declaration.

Unless otherwise stated herein, the facts set forth below are based on my personal knowledge.

3. I understand that this declaration is being submitted in support of the Palestine Liberation Organization's motion for summary judgment in this case.

4. I am the chief representative of the Palestine Liberation Organization ("PLO") to the United States and head of the General Delegation of the PLO to the United States (the "PLO Delegation"). I have been bestowed the rank of Ambassador by the Chairman of the PLO, Mahmoud Abbas.

5. The offices of the PLO Delegation are located at 1732 Wisconsin Avenue, NW, Washington, DC 20007.

6. The PLO office in Washington DC was initially referred to as the Palestine Information Center, changing in 1988 to the Palestine Affairs Center. Upon the signing of the Oslo Accords, the PLO Mission was opened in 1994, and on July 20, 2010, the United States Department of State upgraded the status of the PLO Mission in the United States to the "General Delegation of the PLO to the United States."

7. Prior to my appointment to head the PLO Delegation, I served for 11 years at the Negotiations Affairs Department (NAD) of the PLO, most recently as its Deputy Head and Coordinator-General (2008-2009).

8. I am currently, and have been for over twelve years, employed by the PLO. I receive my salary and benefits directly from the Palestine National Fund ("PNF"), which functions as the treasury of the PLO. The headquarters of the PNF are located in Amman, Jordan.

9. I do not represent, or serve as an agent to, the Palestinian Authority or the Palestinian Interim Self-Government Authority ("PA").

10. I do not serve as a spokesperson for the Palestinian Authority. When I make appearances on behalf of the PLO Delegation, I speak as a representative of the PLO.

11. The PLO Delegation does not engage in fundraising or other commercial activities on behalf of the Palestinian Authority.

12. The PLO Delegation receives its operating funds directly from the PNF. My office sends budgets and financial reports to the PNF's offices in Amman, Jordan, and the auditor of the PLO Delegation sends audits and other financial reports to the PNF.

13. With the exception of contracted employees, who are contracted to work with the PLO Delegation, my staff is employed by the PLO and receives its salaries from the PNF.

14. The PLO is an umbrella organization of various political parties and represents the nationalist aspirations of Palestinians, including those in the diaspora. The PA had its genesis in the Oslo Accords, an agreement between Israel and the PLO "to establish a Palestinian Interim Self-Government Authority . . . for the Palestinian people in the West Bank and the Gaza Strip, for a transitional period not exceeding five years, leading to a permanent settlement based on Security Council Resolutions 242 and 338." Declaration of Principles on Interim Self-Government Arrangements, Sept. 19, 1993, Isr.-P.L.O., Art. I, 32 I.L.M. 1525.

15. Pursuant to both the Agreement on the Gaza Strip and Jericho Area, signed on May 4, 1994, and the Israeli-Palestinian Interim Agreement, signed on September 28, 1995, "the Palestinian Authority will not have powers and responsibilities in the sphere of foreign relations, which sphere includes the establishment abroad of embassies, consulates or other types of foreign missions and posts or permitting their establishment in the Gaza Strip or the Jericho Area, the appointment of or admission of diplomatic and consular staff, and the exercise of diplomatic functions." Agreement on the Gaza Strip and the Jericho Area, May 4, 1994, Isr.-P.L.O., 33 I.L.M. 622. As the United States has not recognized the State of Palestine, it is the PLO, and not the PA, which maintains offices in the United States -- specifically the United Nations office in New York and the office of the PLO Delegation in Washington, D.C.

16. The primary objective of the PLO Delegation is to protect and promote the interests of the Palestinian people in the United States. To carry out this mission, the PLO Delegation is organized into the following five Departments:

- a. The Government Affairs Department is responsible for strengthening the relationship between the PLO and the US Government's Executive branch. The department seeks to maintain a constructive dialogue with members of the Executive branch, and tracks policy changes and the resultant impact on Palestinian-American relations.
- b. The Congressional Affairs Department is in charge of reaching out to and building relations with both the House and Senate, as well as relevant constituents. In its efforts, the Congressional Affairs Department tracks relevant legislation and communicates the Palestinian message to members of the House, the Senate, and interested American constituents.
- c. The Media Affairs Department is in charge of media-related platforms. The department arranges for interviews and press briefings and drafts Op-Eds, press releases and statements, as well as the Delegation's monthly reports to be approved for publishing. Additionally, the Media Affairs Department reaches out to media outlets, communications units and departments at relevant institutions and maintains a professional relationship with major print, radio, and TV agencies. Finally, the department is responsible for maintaining the Delegation's social platforms including Twitter, Facebook, and the Delegation's website.
- d. The Public Affairs Department provides support and resources regarding NGOs, think-tanks and policy institutions, as well as colleges and universities. As a result, the department frequently works closely to monitor relevant events, and ensures that the Palestinian message is represented at such platforms.

- e. The Community Relations and Outreach Department designs and implements outreach projects directed at the Palestinian-American community. Its primary objective is to build relationships with community leaders through an ongoing dialogue concerning matters of interest to the community and the Delegation. The Department also encourages joint activities with the Palestinian-American community and advocates a closer relationship and cooperation between the community and the Delegation.

17. Since the Oslo Accords, the PLO's headquarters, including the administrative offices of its Executive Committee, have been located in the city of Ramallah in the West Bank of the Occupied Palestinian Territory, now the State of Palestine. In addition to the PLO Delegation, and during the period 1998 to 2004, the PLO also maintained and staffed over seventy-five (75) embassies, missions and delegations in countries or organizations outside the United States. The PLO currently maintains over ninety (90) embassies, missions or delegations in countries or organizations outside the United States.

18. During the period 1998 to 2004, the PLO employed at various times approximately 1,300 persons to work at its embassies, missions and delegations in countries or organizations outside the United States. During the same period, the PLO employed thousands of persons worldwide.

19. At no single time during the period 1998 to 2004 did the PLO Delegation have more than approximately ten persons working at the PLO Delegation, even taking into account persons who worked at the PLO Delegation during that period only on a temporary or limited basis. The PLO Delegation was one of the smaller PLO embassies, missions or delegations during that period, measured by number of personnel working at the locations of the various embassies, delegations or missions. During that same period, there were several embassies, missions and delegations maintained by the

PLO around the world that were larger than the PLO Delegation measured by the number of personnel serving at those locations, including the embassies, missions and delegation in the following countries: Jordan, Egypt, Lebanon, France, Chile, the People's Republic of China, Japan, South Africa, Germany, Russia and Brazil.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in Washington, D.C. on this 2nd day of May, 2014.



Amb. Maen Rashid Areikat